

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NORMAN L. NICHOLS, JR.

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:

Civil Action No.
JFM-02-CV-3523

Plaintiff

:

v.

:

:

CAROLINE COUNTY BOARD
OF EDUCATION

:

Defendant

:

: : :

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
OPPOSITION TO MOTION TO FOR SUMMARY JUDGMENT**

Plaintiff, by his attorney, Frederick P. Charleston, Esq., respectfully moves the court to extend the time to file his opposition to Defendant's Motion For Summary Judgment up to and including December 2, 2003, and as grounds therefore, asserts:

1. Plaintiff's opposition is due November 17, 2003.
2. Defendant's Motion and Memorandum consists of 38 pages plus 33 exhibits and seeks to resolve all issues in this case.
3. Plaintiff's counsel is a solo practioner and because of press of business and other matters, he needs additional time to fully respond to the motion for summary judgment.
4. Counsel for Defendant have authorized counsel for Plaintiff to represent herein that they have no objection to the granting of this motion for extension.

Wherefore, for the reasons set forth above, or for whatever other reasons the Court deems just and proper, Plaintiff requests the Court extend the time for filing his

opposition to Defendant's motion for summary judgment up to and including December 2, 2003.

Respectfully Submitted,

_____/s/_____
Frederick P. Charleston, Esq.
Attorney at Law
Fed. Ct. Bar No. 02933
2530 N. Charles St., Suite 201
Baltimore, Maryland 21218
(410) 662-0010

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of November, 2003, a copy of the foregoing Unopposed Motion for Extension of Time To File Opposition To Motion For Summary Judgment was served via facsimile and mailed first class, postage prepaid, to Steven B. Schwartzman, Esq., and Leslie Robert Stellman, Esq., Hodes, Ulman, Pressin & Katz, 901 Dulaney Valley Road, Towson, MD. 21204.

_____/s/_____
Frederick P. Charleston, Esq.